

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

TREVOR FITZGIBBON	)	
	)	
Plaintiff,	)	
	)	
v.	)	<u>Case No. 3:19-cv-477-REP</u>
	)	
JESSELYN A. RADACK	)	
	)	
Defendant.	)	
_____	)	

**MOTION FOR ENTRY OF A PROTECTIVE ORDER**

Plaintiff, Trevor Fitzgibbon, by counsel, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure (the “Rules”), moves the Court to enter a Protective Order.

Counsel have conferred about the matter.

Surprisingly, Defendant Jesselyn Radack refuses to agree to the entry of a protective order.

The arguments and legal bases for this Motion are stated more fully by Plaintiff in his Memorandum in Support, being filed contemporaneously with this Motion pursuant to Local Civil Rule 7(F).

Plaintiff’s proposed Protective Order is attached as Exhibit “A”.

WHEREFORE, Plaintiff respectfully requests the Court to enter an Order:

- (1) granting Plaintiff’s motion for a protective order; and
- (3) awarding such further relief as the Court deems proper.

TREVOR FITZGIBBON

By: /s/ Steven S. Biss

Steven S. Biss (VSB # 32972)  
300 West Main Street, Suite 102  
Charlottesville, Virginia 22903  
Telephone: (804) 501-8272  
Facsimile: (202) 318-4098  
Email: [stevenbiss@earthlink.net](mailto:stevenbiss@earthlink.net)

*Counsel for the Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 28, 2020 a copy of the foregoing was filed electronically using the Court's CM/ECF system, which will send notice of electronic filing to counsel for the Defendant and all interested parties receiving notices via CM/ECF.

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Charlottesville, Virginia 22903  
Telephone: (804) 501-8272  
Facsimile: (202) 318-4098  
Email: [stevenbiss@earthlink.net](mailto:stevenbiss@earthlink.net)

*Counsel for the Plaintiff*